



LOWEY DANNENBERG, P.C.

March 30, 2018

VIA ECF

The Honorable Henry Pitman
United States Magistrate Judge
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Laydon v. Mizuho Bank, Ltd. et al.*, No. 12-cv-3419 (GBD) (HBP)

Dear Judge Pitman:

As counsel for Plaintiff, we write on behalf of Plaintiff and Non-Settling Defendants to jointly request a 60-day extension of all deadlines in the current scheduling order to allow substantial completion of the parties' responses to document discovery requests. The parties disagree whether Plaintiff should be permitted to propound any new document discovery requests during this extension and reserve their respective rights, but do not believe the issue is ripe for the Court and would bring any dispute to the Court at a later time if necessary.

The attached Proposed Revised Scheduling Order extends the April 2 substantial completion deadline, as well as the following deadlines in the Scheduling Order, by 60 days.

This is the parties' second request for an extension of these deadlines. The Court granted the previous request for a 60-day extension.

We thank the Court for its consideration and are available to address any further questions Your Honor may have.

Respectfully submitted,

Vincent Briganti

cc: The Honorable George B. Daniels (via Federal Express)
All Counsel of Record (via ECF)

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